

Fact Sheet



For Final Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-03900007-2017**
Application Received: **March 31, 2016**
Plant Identification Number: **03900007**
Permittee: **Bayer CropScience LP**
(Larvin)
(Group 6 of 8)
Facility Name: **Institute Site**
Mailing Address: **P.O. Box 1005**
Institute, WV 25112

Physical Location:	Institute, Kanawha County, West Virginia
UTM Coordinates:	432.0 km Easting • 4,248.3 km Northing • Zone 17
Directions:	The facility is located west of Institute, WV, adjacent to State Route 25 and West Virginia State College.

Facility Description

Bayer CropScience, an agricultural chemical based company, is responsible for producing raw materials used in the manufacture of agricultural chemicals. The product produced at the Institute site is the LARVIN brand thiodicarb. SIC Code: 2879

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions (Group 6 Only)	2015 Actual Emissions (Group 6 Only)
Carbon Monoxide (CO)	9.37	4.14
Nitrogen Oxides (NO _x)	51.4	13.73
Particulate Matter (PM ₁₀)	2.6	0.57
Total Particulate Matter (TSP)	2.6	0.57
Sulfur Dioxide (SO ₂)	68.69	8.13
Volatile Organic Compounds (VOC)	22.31	2.00
<i>PM₁₀ is a component of TSP.</i>		
Hazardous Air Pollutants	Potential Emissions (Group 6 Only)	2015 Actual Emissions (Group 6 Only)
Methanol	18.8	1.11
Total HAPs	21.74	1.45

Some of the above HAPs may be counted as PM or VOCs.

Title V Program Applicability Basis

This facility has the potential to emit over 100 TPY of criteria pollutants, over 10 TPY of a single HAP, and over 25 tons of aggregate HAPs. Due to this facility's potential to emit over 100 tons per year of criteria pollutant, over 10 tons per year of a single HAP, and over 25 tons of aggregate HAPs, Bayer CropScience's Institute Site is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Particulate Matter emissions
	45CSR11	Standby plans for emergency episodes.
	45CSR13	Permits for construction, modification, relocation, etc.
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement
	45CSR34	Emission standards for HAPs
	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 63 Subpart H	NESHAP Equipment Leaks

	40 C.F.R. Part 63 Subpart MMM	Pesticide Active Ingredient (PAI) MACT
State Only:	45CSR4 45CSR21 45CSR27	No objectionable odors. Volatile Organic Compound emissions Toxic Air Pollutants

*Other groups at this facility may be subject to additional applicable state and federal rules.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-0641E	5/6/2014	
CO-27-92-12	4/30/1992	
CO-R21-97-4	2/19/1997	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

Changes made to the Title V Permit since the last revision are summarized below:

Changes due to R13-0641E:

1. The modified date for the belt filter [E-34] will be updated to 2014, replacing the installation date of 1984.
2. The belt filter secondary emergency vent [PSV 3230-106] was added to the Emission Units Table.

Due to amended 40CFR63, Subpart MMM MACT the following changes have also been made:

3. Revised Condition 4.1.18.
4. Added Condition 4.1.22 to add requirements for opening safety devices.
5. Added Condition 4.1.23 to add requirements for affirmative defense for violation of emission standards during malfunction.
6. Added Condition 4.1.24 to add compliance dates with possible extensions for pressure relief device provisions.

7. Revised Conditions 4.4.3(g)(2)(ii)(A), (2)(iii)(A), (2)(iii)(B), (4)(v)(A), and (6). Added Condition 4.4.3(g)(11).
8. Revised Conditions 4.5.1(h)(2) and (3)(ii)(J). Added Condition 4.5.1(h)(3)(v).
9. Added a sentence to Condition 4.2.9(b)(1)(ii).
10. Revised Condition 4.4.4(a)(3). Added Condition 4.4.4(a)(4).
11. Revised Condition 4.5.2(i). Added Conditions 4.5.2(e), (f), (m), and (p)

Other Changes:

1. Removed previously misnumbered Condition 4.1.19 as it was a duplicate of Condition 4.1.15.
2. Renumbered previous Condition 4.1.20 to 4.1.25.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

1. 40 C.F.R. Part 64 - Compliance Assurance Monitoring (CAM)

Group 6 is not subject for the following reasons:

40CFR§64.2(a)(3) – This Group does not have potential, pre-control device emissions equal to or greater than 100 percent of the amount, in tons per year, of any pollutant that would require the facility to be classified as a major source.

Request for Variances or Alternatives

None.

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date:	February 7, 2017
Ending Date:	March 9, 2017

All written comments should be addressed to the following individual and office:

Mike Egnor
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Mike Egnor
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1208 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Not applicable.